

# EXHIBIT “B”

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.:  
Date Purchased:

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EBONY S. JERIDO,

**SUMMONS**

Plaintiff,

Plaintiffs designate  
County as the place  
of trial.

-against-

SHREE K. SYANGTAN AND VENTURE LEASING,  
LLC,

The basis of venue  
is: Plaintiff's  
Residence

Defendant(s).

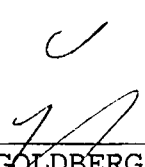
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Plaintiffs reside at:  
750 Grand Concourse  
Bronx, NY 10451  
County of Bronx

To the above named Defendant:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: NEW YORK, NY  
April 17, 2018

  
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EVAN GOLDBERG  
TROLMAN, GLASER & LICHTMAN, P.C.  
Attorney for Plaintiff(s)  
EBONY S. JERIDO  
747 Third Avenue, 23rd Floor  
New York, NY 10017  
(212)750-1200  
Our File No. 4002001

TO:

SHREE K. SYANGTAN  
9218 51ST AVENUE  
FLUSHING, NY 11373

VENTURE LEASING LLC  
1415 CROMWELL AVENUE  
BRONX, NY 10452

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
EBONY S. JERIDO,

VERIFIED COMPLAINT  
Index No.

Plaintiff(s),

-against-

SHREE K. SYANGTAN AND VENTURE LEASING,  
LLC,

Defendant(s).

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Plaintiff, by her attorneys, TROLMAN, GLASER & LICHTMAN,  
P.C., complaining of the defendants, all upon information and  
belief, respectfully alleges:

1. That at all times herein mentioned the plaintiff  
EBONY S. JERIDO was and still is a resident of the County of  
Bronx, City and State of New York.

2. That, upon information and belief, at all times  
herein mentioned the defendant, SHREE K. SYANGTAN, was and still  
is a resident of the County of New York, City and State of New  
York.

3. That, upon information and belief, at all times  
herein mentioned the defendant, VENTURE LEASING, LLC, was a  
resident of or maintained its principal office in the County of  
Bronx, City and State of New York.

4. That, upon information and belief, at all times  
herein mentioned the defendant, VENTURE LEASING, LLC, was and

still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.

5. That at all times herein mentioned the defendant, VENTURE LEASING, LLC, was the registered owner of a certain 2016 Nissan motor vehicle bearing New York State Registration No. T719607C for the year 2018.

6. That at all times herein mentioned the defendant, SHREE K. SYANGTAN, operated and controlled the aforesaid 2016 Nissan motor vehicle bearing New York State Registration No. T719607C for the year 2018, with the knowledge, permission and consent of the defendant, VENTURE LEASING, LLC.

7. That at all times herein mentioned the defendant, SHREE K. SYANGTAN, was employed and at the time and place of the occurrence hereinafter set forth was acting within the scope of his employment, on the business of his employer, for and on behalf of his employer and with a view toward furthering the business interests of his employer.

8. That at all times herein mentioned the roadway at 160 East 153<sup>rd</sup> Street, in the County of Bronx, City and State of New York, was and still is a public road and thoroughfare in the County of Bronx, City and State of New York.

9. That at all times herein mentioned, and on or about November 03, 2016, the defendant, SHREE K. SYANGTAN, was operating and controlling a certain 2016 Nissan motor vehicle bearing New York State Registration No. T719607C for the year 2018, owned as

aforesaid, over, along and upon the roadway at 160 East 153<sup>rd</sup> Street, in the County of Bronx, City and State of New York.

10. That all times herein mentioned, and on or about January 2, 2018, the defendant, SHREE K. SYANGTAN, drove, operated and controlled the aforesaid 2016 Nissan motor vehicle bearing New York State Registration No. T719607C for the year 2018, owned as aforesaid, over, along and upon the roadway at 160 East 153<sup>rd</sup> Street, in the County of Bronx, City and State of New York, when the said 2016 Nissan motor vehicle being operated by him was in contact with the plaintiff, EBONY S. JERIDO, a pedestrian.

1. That as a result of the aforesaid occurrence the plaintiff EBONY S. JERIDO sustained grievous personal injury and attendant damage.

2. That the said occurrence and the injuries resulting therefrom was caused by reason of the negligence of the defendants in the ownership, operation, maintenance and control of the motor vehicle owned and operated by them.

3. That the defendants were negligent in that their motor vehicle was operated in a reckless and careless manner; in that it was not kept under proper control; in that it was operated at an improper rate of speed under the existing road conditions; in that said motor vehicle was caused, allowed and permitted to be, become and remain operated in such a reckless and careless manner that the same was caused to come into contact with the plaintiff, a pedestrian; in that the operator thereof failed to

properly utilize the steering mechanism; failed to give the plaintiff the right of way; failed to keep a proper lookout; failed to properly utilize his horn or other signal or warning device; failed to give any signal or warning of his approach; failed to make proper and diligent application of his brakes and/or braking equipment, and was otherwise reckless and careless in the premises.

4. That as a result of the foregoing the plaintiff, EBONY S. JERIDO, suffered a "serious injury" as defined in Section 5102, Subdivision (d) of the Insurance Law of the State of New York.

5. That by reason thereof the plaintiff, EBONY S. JERIDO, is entitled to recover for non-economic loss and for such economic losses as are not included within the definition of "basic economic loss" as set forth in Section 5102, Subdivision (a) of the Insurance Law of the State of New York.

6. That the plaintiff, EBONY S. JERIDO, is a "covered person" within the definition of and as defined in Section 5102, Subdivision (j) of the Insurance Law of the State of New York.

7. That this action falls within the exemption as set forth within CPLR section 1602, including but not limited to CPLR section 1602 (6).

8. That by reason of the foregoing, the plaintiff, EBONY S. JERIDO, became sick, sore and disabled; sustained grievous personal injuries to various parts of her body; suffered and will continue to suffer great pain and anguish in body and mind; received necessary hospital care and attention by reason of his injuries; that she has necessarily received, is receiving and will continue to receive necessary medical care by reason of the injuries sustained by her and in connection with which expenses have, are and will continue to be incurred; that she has been greatly incapacitated and has been unable to attend to her usual duties as she had theretofore done, and, upon information and belief, her injuries are permanent, protracted and disabling in nature.


19. That the amount of damages sought by the plaintiff against the defendants, SHREE K. SYANGTN AND VENTURE LEASING LLC, exceeds the jurisdictional limits of all lower Courts which would otherwise have had jurisdiction.



WHEREFORE, the plaintiff, EBONY S. JERIDO, demands judgment against the defendants, SHREE K. SYANGTN AND VENTURE LEASING LLC, for such amount as may seem just and proper, in accordance with the law and damages sustained by him, as will be determined upon the trial of this action, together with the costs and disbursements of this action.

Dated: New York, NY  
April 17, 2018

Yours, etc.

  
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EVAN GOLDBERG  
TROLMAN, GLASER & LICHTMAN, P.C.  
Attorney for Plaintiff(s)  
EBONY S. JERIDO  
747 Third Avenue  
23rd Floor  
New York, NY 10017  
(212) 750-1200  
Our File No. 4002001

**ATTORNEY VERIFICATION**

EVAN GOLDBERG being an attorney duly licensed to practice law in the State of New York, attorneys of record for the plaintiff, hereby affirms the truth of the following statements, all under penalty of perjury:

That affirmant has read the foregoing **SUMMONS AND VERIFIED COMPLAINT** and knows the contents thereof; that the same is true to affirmant's own knowledge except as to the matters therein stated to be alleged upon information and belief, this entire EVAN GOLDBERG, being based upon information and belief the source thereof being the investigation conducted and the file maintained in this office, and as to those matters affirmant believes it to be true; the reason that this verification is not made by plaintiff is that plaintiff does not reside in the county of New York wherein affirmant maintains an office.

Dated: New York, New York  
April 17, 2018

  
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EVAN GOLDBERG